

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA**

JOHN DOE,)
)
Plaintiff,)
)
v.) Case No: 21-CV-00144-TWP-MJD
UNIVERSITY OF SOUTHERN)
INDIANA, et al.)

**DEFENDANT D. STAFFORD & ASSOCIATES' MOTION TO JOIN THE
MOTIONS TO DISMISS OF USI, DOSS AND DEVONSHIRE**

NOW COMES the Defendant, **D. STAFFORD & ASSOCIATES**, by its attorneys,
SANCHEZ DANIELS & HOFFMAN LLP, and for its motion to join the motions to dismiss of
USI, Doss and Devonshire for its responsive pleading to Plaintiff's Second Amended Complaint,
states as follows:

1. Defendant, **D. STAFFORD & ASSOCIATES** requests to join the motion to
Dismiss of Doss and Devonshire [Dkts. 219 and 220] in its entirety, as its responsive pleading to
Plaintiff's Second Amended Complaint and to request the same relief requested in said motion
for the reasons set forth in that motion and memorandum.

2. Defendant, **D. STAFFORD & ASSOCIATES** requests to join the motion to
Dismiss of USI's [Dkts. 209, 210. 235] in its entirety, as its responsive pleading to Plaintiff's
Second Amended Complaint and to request the same relief requested in said motion for the
reasons set forth in that motion and memorandum.

WHEREFORE, defendant, **D. Stafford & Associates**, requests that this Honorable Court permit it to join the motions to dismiss of USI, Doss and Devonshire and for any and all further relief this Honorable Court finds equitable and just.

Respectfully submitted,

By: /s/John R. McInerney

Attorney for Defendant,
D. STAFFORD & ASSOCIATES

SANCHEZ DANIELS & HOFFMAN LLP
333 West Wacker Drive
Suite 500
Chicago, Illinois 60606
T: (312) 641-1555
F: (312) 641-3004
E: thoffman@sanchezdh.com

CERTIFICATE OF SERVICE

I certify that on June 19, 2023, the foregoing document was electronically filed with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to the attorneys of record and a copy of same and that this statement as set forth is true and correct.

/s/ John R.McInerney